

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
ABOUDULAYE KEITA, :
a/k/a "Abdoulaye," :
MARQUISE DESHAUN AUSTIN, :
CEDRIC KEYON CHRISTOPHER, JR., and :
JAILYN HILLIARD, :
:
Defendants. :
- - - - - x

INDICTMENT

22 Cr.

22 CRIM 435

COUNT ONE
(Firearms Trafficking Conspiracy)

The Grand Jury charges:

1. From at least in or about October 2020, up to and including in or about December 2021, in the Southern District of New York and elsewhere, ABOUDULAYE KEITA, a/k/a "Abdoulaye," MARQUISE DESHAUN AUSTIN, CEDRIC KEYON CHRISTOPHER, JR., and JAILYN HILLIARD, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, unlicensed dealing in firearms in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and object of the conspiracy that ABOUDULAYE KEITA, a/k/a "Abdoulaye," MARQUISE DESHAUN AUSTIN, CEDRIC KEYON CHRISTOPHER, JR., and JAILYN HILLIARD, the

defendants, and others known and unknown, not being licensed importers, licensed manufacturers, or licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, would and did willfully and knowingly engage in the business of dealing in firearms, and in the course of such business would and did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, ABOUDULAYE KEITA, a/k/a "Abdoulaye," MARQUISE DESHAUN AUSTIN, CEDRIC KEYON CHRISTOPHER, JR., and JAILYN HILLIARD, the defendants, committed the following overt acts, in the Southern District of New York and elsewhere:

a. On or about February 26, 2021, CHRISTOPHER purchased three firearms from a federal firearms licensee ("FFL") in Bryant, Arkansas. CHRISTOPHER then transferred at least one of the firearms to KEITA for transportation to the Bronx, New York, where the firearm was recovered by law enforcement on or about August 27, 2021.

b. On or about May 25, 2021, AUSTIN purchased three firearms from FFLs in North Little Rock, Arkansas and Sherwood, Arkansas. AUSTIN then transferred at least two of the

firearms to KEITA for transportation to the Bronx, New York, where the firearms were recovered by law enforcement on or about November 5, 2021 and June 9, 2022.

c. On or about December 30, 2021, HILLIARD purchased three firearms from an FFL in Cabot, Arkansas. HILLIARD then transferred at least one of the firearms to KEITA for transportation to the Bronx, New York, where the firearm was recovered by law enforcement on or about March 25, 2022.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Firearms Trafficking)

The Grand Jury further charges:

4. From at least in or about December 2020, up to and including in or about March 2022, in the Southern District of New York and elsewhere, ABOUDULAYE KEITA, a/k/a "Abdoulaye," MARQUISE DESHAUN AUSTIN, CEDRIC KEYON CHRISTOPHER, JR., and JAILYN HILLIARD, the defendants, not being licensed importers, licensed manufacturers, or licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully and knowingly engage in the business of dealing in firearms in interstate and foreign commerce, and in the course of such business shipped, transported, and received firearms in interstate and foreign commerce, to wit, AUSTIN, CHRISTOPHER, and HILLIARD each purchased firearms from FFLs in Arkansas, and

transferred and sold some of the firearms to KEITA and co-conspirators not named herein for transfer and resale in, among other places, the Bronx, New York.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1), and 2.)

COUNT THREE

(Interstate Travel with Intent to Commit Gun Trafficking)

The Grand Jury further charges:

5. From at least in or about December 2020, up to and including in or about March 2022, in the Southern District of New York and elsewhere, ABOUDULAYE KEITA, a/k/a "Abdoulaye," the defendant, with the intent to engage in conduct that constitutes a violation of Title 18, United States Code, Section 922(a)(1)(A), traveled from one state into another state, and acquired, and attempted to acquire, a firearm in such other state, to wit, KEITA traveled between Arkansas and Tennessee and took bus trips between Tennessee and New York for the purpose of acquiring firearms, with the intent that the firearms be illegally resold in New York.

(Title 18, United States Code, Sections 924(n) and 2.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One, Two and Three of this Indictment, ABOUDULAYE KEITA, a/k/a "Abdoulaye," MARQUISE DESHAUN AUSTIN, CEDRIC KEYON CHRISTOPHER, JR., and JAILYN HILLIARD, the defendants, shall

forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offenses, including but not limited to:

a. One Springfield Armory 911 pistol, serial number CC065865, purchased by AUSTIN;

b. One Taurus G3C pistol, serial number ACC620236, purchased by AUSTIN;

c. One Taurus G2C pistol, serial number ACC653353, purchased by AUSTIN;

d. One Glock 19 pistol, serial number BTPS002, purchased by AUSTIN;

e. One HS Produkt XDM pistol, serial number MG623859, purchased by AUSTIN;

f. One Smith & Wesson SD40VE pistol, serial number FCN1520, purchased by AUSTIN;

g. One Taurus G3 pistol, serial number ACA465999, purchased by AUSTIN;

h. One Smith & Wesson SD40VE pistol, serial number FWW3520, purchased by AUSTIN;

i. One Smith & Wesson SW9VE pistol, serial number FCR6180, purchased by AUSTIN;

j. One Taurus Spectrum pistol, serial number 1F026255, purchased by AUSTIN;

k. One Lorcin L380 pistol, serial number 228280
purchased by AUSTIN;

l. One Glock 17 pistol, serial number BNNB458,
purchased by AUSTIN;

m. One Taurus G3C pistol, serial number
ABN323411, purchased by CHRISTOPHER;

n. One Taurus G3C pistol, serial number
ACA452018, purchased by CHRISTOPHER;

o. One Weihrauch Windicator revolver, serial
number 1574498, purchased by CHRISTOPHER;

p. One Glock 21 pistol, serial number BCKS441,
purchased by CHRISTOPHER;

q. One Sarsilmaz SAR 9 pistol, serial number
T1102-21BV50455, purchased by CHRISTOPHER;

r. One Ruger-57 pistol, serial number 643-
20086, purchased by HILLIARD;

s. One Armscor M200 revolver, serial number
RIA2418133, purchased by HILLIARD; and

t. One Glock 19 pistol, serial number BUBB488,
purchased by HILLIARD.

Substitute Assets Provision

7. If any of the above-described forfeitable
property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

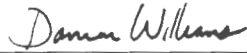
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendants.

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(18 U.S.C. §§ 371, 922(a)(1)(A),
924(a)(1), 924(n), and 2.)

DAMIAN WILLIAMS
United States Attorney


Foreperson

TRUE BILL, INDICTMENT

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DJ - PRESKA

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